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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Miguel Sanchez,  
Plaintiff,

vs.

Kilolo Kijakazi, Acting  
Commissioner of Social Security,  
Defendant.

Case No. 1:21-cv-00907-AWI-BAM  
STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF  
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 4-day extension of time, from August 11, 2022 to August 15, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S OPENING BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's third request for an extension of time. Counsel for the Plaintiff is currently out of State attending to an emergency with her ill father. (see

1 attached declaration). Additional time will be needed in light of limited access to  
2 her computer.

3 Counsel requires additional time to brief the issues thoroughly for the  
4 Court's consideration. Defendant does not oppose the requested extension.  
5 Counsel apologizes to the Defendant and Court for any inconvenience this may  
6 cause.

7  
8 Respectfully submitted,

9 Dated: August 11, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

10  
11 By: /s/ Dolly M. Trompeter  
12 DOLLY M. TROMPETER  
13 Attorneys for Plaintiff

14  
15 Dated: August 11, 2022

16 PHILLIP A. TALBERT  
17 United States Attorney  
18 PETER K. THOMPSON  
19 Acting Regional Chief Counsel, Region IX  
20 Social Security Administration

21 By: \*/s/ Caspar I. Chan  
22 Caspar I. Chan  
23 Special Assistant United States Attorney  
24 Attorneys for Defendant  
25 (\*As authorized by email on August 11, 2022)  
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**ORDER**

Pursuant to the parties' stipulation, and good cause appearing, Plaintiff's request for a brief extension of time to file an Opening Brief is GRANTED. Plaintiff's Opening Brief shall be filed on or before August 15, 2022. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: August 12, 2022

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE